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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MELISSA ANN DOBBS,

Defendant.

No. 3:24-cr-00012-JMK-MMS

COUNT 1

HEALTH CARE FRAUD

Vio. of 18 U.S.C. § 1347

COUNT 2

FALSE STATEMENT IN LOAN
APPLICATION

Vio. Of 18 U.S.C. § 1014

CRIMINAL FORFEITURE
ALLEGATION

18 U.S.C. § 981(a)(1)(C) and (a)(7) and
28 U.S.C. § 2461(c)

INDICTMENT

The Grand Jury charges that:

COUNT 1

Beginning on or about January 1, 2017, and continuing until on or about February 23, 2021, within the District of Alaska and elsewhere, the defendant, MELISSA ANN DOBBS, knowingly and willfully executed, and attempted to execute, a scheme and artifice to defraud any health care benefit program, and to obtain, by means of false and fraudulent pretenses, representations, and promises, any of the money and property owned by, and under the custody and control of, any health care benefit program, in connection with the delivery of and payment for health care benefits,

All of which is in violation of in violation of Title 18, United States Code, § 1347.

COUNT 2

On or about April 28, 2020, within in the District of Alaska and elsewhere, the defendant, MELISSA ANN DOBBS, with the purpose of influencing in any way the action of a federal insured bank, knowingly made a false statement and report to a federally insured bank, knowing it was false.

All of which is in violation of Title 18, United States Code, § 1014.

CRIMINAL FORFEITURE ALLEGATION

1. The allegations contained in Counts 1 and 2 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and (a)(7).

2. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 1014 and 1347 set forth in Counts 1 and 2 of this Indictment, the defendant, MELISSA ANN DOBBS, shall forfeit to the United States of America, pursuant to Title

18, United States Code, Sections 981(a)(1)(C) and (a)(7), any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offenses. The property to be forfeited includes, but is not limited to, the following: all funds seized by the State of Alaska pursuant to search warrant number 3AN-20-4172SW.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 981(a)(1)(C) and (a)(7) and 28 U.S.C. § 2461(c).

A TRUE BILL

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Morgan J. Walker
MORGAN J. WALKER
Assistant U.S. Attorney
United States of America

s/ Kate Vogel for
S. LANE TUCKER
United States Attorney

DATE: 1/16/2024